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3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**
5 **OAKLAND DIVISION**
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7 IN RE CALIFORNIA BAIL BOND
8 ANTITRUST LITIGATION
9
10 THIS DOCUMENT RELATES TO:
11 ALL ACTIONS
12

Master Docket No. 19-cv-00717-JST-DMR
CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION TO FILE
THIRD CONSOLIDATED AMENDED
COMPLAINT**

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1 Pursuant to Civil Local Rule 6-2, all Plaintiffs and Defendants (the “Parties”) in the
 2 above-entitled action stipulate as follows:

3 **WHEREAS**, the Court ordered the Parties to proceed with discovery on December 10,
 4 2020, with Dismissed Defendants¹ to submit pre-amendment discovery focused on deficiencies
 5 the Court identified in Plaintiffs’ Second Amended Complaint (ECF No. 151);

6 **WHEREAS**, the Court referred the management of discovery in this case, “including the
 7 issues set forth in the [P]arties’ joint case management statement, ECF No. 173,” to Magistrate
 8 Judge Ryu on January 25, 2021 (ECF No. 175);

9 **WHEREAS**, on March 1, 2021, the Court extended the deadline for Plaintiffs to file their
 10 Third Consolidated Amended Complaint (“TCAC”) from March 8, 2021 (ECF No. 165) to April
 11 7, 2021 (ECF No. 178), without prejudice to any Party seeking further extension;

12 **WHEREAS**, on March 29, 2021, the Court further extended the deadline for Plaintiffs to
 13 file their TCAC from April 7, 2021 to June 7, 2021 (ECF No. 181) while Plaintiffs and Dismissed
 14 Defendants awaited an order from Magistrate Judge Ryu regarding Parties’ March 10, 2021 joint
 15 discovery letter brief concerning discovery to be completed before Plaintiffs file their TCAC
 16 (ECF No. 179), without prejudice to any Party seeking further extension;

17 **WHEREAS**, on May 13, 2021 Judge Ryu set a deadline of July 12, 2021 for Plaintiffs
 18 and Dismissed Defendants to file any further joint discovery letter on the current dispute before
 19 Dismissed Defendants’ pre-amendment production of documents (ECF No. 191);

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23 ¹ For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company,
 24 International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity
 25 Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc.,
 26 Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage
 27 Insurance Company, Seaview Insurance Company, Danielson National Insurance Company,
 28 Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon
 Insurance Company, North River Insurance Company, Philadelphia Reinsurance Corporation,
 Sun Surety Insurance Company, United States Fire Insurance Company, Universal Fire &
 Casualty Company, Williamsburg National Insurance Company, California Bail Agents
 Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc.,
 All-Pro Bail Bonds Inc., and Jerry Watson.

1 **WHEREAS**, the Parties have agreed to extend the deadline for Plaintiffs to file their
2 TCAC by an additional 90 days beyond Judge Ryu's July 12, 2021 deadline without prejudice to
3 any Party seeking a further extension;

4 **WHEREAS**, the Court has set no further deadlines in this matter, and therefore none
5 would be affected;

6 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
7 between the Parties that Plaintiffs shall have until October 11, 2021 to file their TCAC without
8 prejudice to any Party seeking to further extend that deadline.

9 Dated: June 4, 2021

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiffs shall have until October 11, 2021 to file their TCAC without prejudice to any Party seeking to further extend that deadline.

Dated: June __, 2021

THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Adam Gitlin, attest that the concurrence in the filing of this document has been obtained
3 from the other signatories. Executed on June 4, 2021, in Oakland, California.

4 */s/ Adam Gitlin* _____

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